# IN THE UNITED STATES BANKRUPTCY COURT FOR MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: Deborah L. Sawyer

Debtor

CASE NO.: 24-02258-MJC

CHAPTER 13

Statebridge Company, LLC as servicer for Wilmington Savings Fund Society,

FSB, d/b/a Christiana Trust as Trustee for

PNPMS Trust III

v.

Judge: Mark J. Conway

Hearing Date:

Objection Deadline:

Deborah L. Sawyer Jack N. Zaharopoulos - Trustee Respondents

#### NOTICE OF APPEARANCE

PLEASE TAKE NOTICE that the undersigned hereby appears in the above-captioned Chapter 13 case on behalf of Statebridge Company, LLC as servicer for Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust as Trustee for PNPMS Trust III, and hereby requests that all notices given or required to be given in these cases, and all papers served or required to be served in these cases, be given to and served upon the following:

### FRIEDMAN VARTOLO LLP

Attorneys for Statebridge Company, LLC as Servicer for Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust as Trustee for PNPMS Trust III 1325 Franklin Avenue, Suite 160 Garden City, NY 11530 Bankruptcy@FriedmanVartolo.com

**PLEASE TAKE FURTHER NOTICE** that the foregoing demand includes all pleadings of any kind including, without limitation, all notices, motions, complaints, and orders, whether written or oral, formal, or informal, however transmitted, related in any way to the debtor, its property or its estates. The persons listed above request that their names and addresses be added to the mailing matrix.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Demand for Service of Papers nor any later appearance, pleading, proof of claim, claim, or suit shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after de novo review by a District Judge, (ii) the right to trial by jury in any proceeding triable in this case or any case, controversy, or proceeding related to this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction or venue of this Court for any purpose other than with respect to this Notice, (v) an election of remedy, or (vi) any other right, claim, defense, setoff, or recoupment, in law or in equity, under any agreement, all of which are expressly waived.

Dated: October 18, 2024

By: /s/ Lauren Moyer
Lauren Moyer, Esq.
FRIEDMAN VARTOLO LLP
Attorneys for Movant
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Jack N. Zaharopoulos - Trustee
Respondents

### CERTIFICATE OF SERVICE OF NOTICE OF APPEARANCE

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on October 18, 2024.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was first-class mail and electronic notification.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the full name, email address, and where applicable the full name of the person or entity represented, for each party served by electronic transmission is listed under the heading "Service by NEF," and the full name and complete postal address for each party served by mail, is listed under the heading "Service by First-Class Mail."

EXECUTED ON: 10/18/2024

By: /s/ Lauren Moyer Lauren Moyer, Esq. FRIEDMAN VARTOLO LLP Attorneys for Movant 1325 Franklin Avenue, Suite 160 Garden City, NY 11530 T: (212) 471-5100

F: (212) 471-5150

Bankruptcy@FriedmanVartolo.com

Desc

### Service by Regular Mail

Deborah L. Sawyer 60 Central Avenue Wellsboro, PA 16901 *Bankruptcy Debtor* 

### **Service by NEF**

Jack N. Zaharopoulos 8125 Adams Drive, Suite A Hummelstown, PA 17036 *Bankruptcy Trustee* 

Lisa A. Rynard Law Office of Lisa A. Rynard 240 Broad Street Montoursville, PA 17754 *Attorney* 

United States Trustee US Courthouse 1501 N. 6th St Harrisburg, PA 17102 Asst. U.S. Trustee